

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
V.)	Criminal No. 04-10028-RCL
)	
SANTINO HALL,)	
Defendant.)	

JOINT INITIAL STATUS MEMORANDUM

Pursuant to Local Rule 116.5(A), the parties hereby submit this Joint Initial Status Report to advise the Court of the following:

1. The parties do not seek relief from applicable timing requirements imposed by the local rule.
2. The defendant and government seek discovery concerning any expert witnesses, pursuant to Fed. R. Crim. P. 16(a)(1)(G). The government has agreed to provide the defendant with discovery concerning any expert witnesses twenty-one (21) days before trial, and the defendant has agreed to provide the government with any reciprocal discovery concerning expert witnesses within fourteen (14) days of trial as required under Fed. R. Crim. P. 16(b)(1)(C).
3. Although the government has provided the defendant with all documents and other discoverable materials in this case pursuant to automatic discovery, the government may receive additional discoverable information, which it will turn over to the defense. Additionally, the defendant does not presently have any discoverable information, but pursuant to their agreement to provide reciprocal discovery, will provide the government with any such information received in the future.
4. Defense counsel has not yet had an opportunity to review the discovery materials with the defendant, nor has he been able to make a determination as to whether he will be filing any dispositive motions in this case, and, therefore, requests additional time to consider this option before the Court establishes a motion date under Fed. R. Crim. P. 12.
5. The parties request that the period between May 7, 2007 and the date of the next scheduled Status Conference be excluded under the Speedy Trial Act.

6. There have been no discussions between the parties regarding the possibility of an early resolution of the case.
7. The parties request that a Final Status Conference be scheduled for a date in late June, 2007.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

SANTINO HALL,
Defendant

By: /s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3103

/s/Harold Hakala/AEL
HAROLD HAKALA, Esq.
Attorney at Law
15 Court Square
Boston, MA 02108
(617) 742-7040

Dated: May 3, 2007